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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ESTATE OF ARNOLD M. SOSKIN; ARNOLD M.
SOSKIN REVOCABLE TRUST; RICHARD N.
SOSKIN, individually and in his capacity as
personal representative of the Estate of Arnold M.
Soskin and as Trustee of the Arnold M. Soskin
Revocable Trust; NANCY S. LURIE, individually
and in her capacity as personal representative of the

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04505 (SMB)

Estate of Arnold M. Soskin and as Trustee of the
Arnold M. Soskin Revocable Trust; DEBRA
BECKER; ROBERT S. SOSKIN; SAMUEL S.
SOSKIN; and RENEE R. SOSKIN,

Defendants.

STIPULATION AND ORDER

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Defendants Estate of Arnold M. Soskin; Arnold M. Soskin Revocable Trust; Richard N. Soskin, individually and in his capacity as personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; Nancy S. Lurie, individually and in her capacity as personal representative of the Estate of Arnold M. Soskin and as Trustee of the Arnold M. Soskin Revocable Trust; Debra Becker; Robert S. Soskin; Samuel S. Soskin; and Renee R. Soskin (collectively, the “Defendants”) represent as follows:

WHEREAS, on November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the “LPO”) [Adv. Pro. No. 08-01789 (SMB), Dkt. 3141];

WHEREAS, the Trustee commenced this action (the “Adversary Proceeding”) by filing a complaint (the “Complaint”) on November 30, 2010 [Dkt. 1];

WHEREAS, Defendant Renee R. Soskin filed an answer to the Complaint and a cross claim against the other Defendants (the “Cross Claim”) on March 2, 2015 [Dkt. 57];

WHEREAS, Defendants Estate of Arnold M. Soskin, Arnold M. Soskin Revocable Trust, Richard N. Soskin, Nancy S. Lurie, Debra Becker, Robert S. Soskin, and Samuel S.

Soskin filed an answer to the Complaint and an answer to the Cross Claim on March 16, 2015 [Dkt. 60];

WHEREAS, pursuant to the Notice of Applicability filed by the Trustee in this Adversary Proceeding on February 4, 2011 [Dkt. 4], the LPO and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter;

WHEREAS, under the Avoidance Procedures, “the parties shall meet, either in person or by teleconference, and confer on a mediation, discovery and litigation plan (the ‘Initial Case Conference’)” within 30 days after the last defendant files an answer to the Complaint (the “Initial Case Conference Period”);

WHEREAS, the Trustee and Defendants have agreed to extend the Initial Case Conference Period in this Adversary Proceeding, which would otherwise have ended on April 15, 2015; and

WHEREAS, nothing in this Stipulation is a waiver of the Defendants’ right to request from the Court (and the Trustee’s right to object to any such request), or the parties’ rights to agree to, a further extension the Initial Case Conference Period.

NOW, THEREFORE, the Parties stipulate and agree to, and the Court **ORDERS**, that the Initial Case Conference Period is hereby extended to May 1, 2015.

Dated: April 6, 2015
New York, New York

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Attorneys for Defendant Renee R. Soskin

SO ORDERED ON April 6th, 2015:

/s/ STUART M. BERNSTEIN
HONORABLE STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE